

MEMORANDUM

TO: Division of Shellfish Sanitation Staff

THROUGH: Robert W. Hicks, Director
Office of Environmental Programs

FROM: Robert E. Croonenberghs, PhD., Director
Division of Shellfish Sanitation

SUBJECT: Shellfish/Crustacea Plants - Procedure - Inspection - Inspection Frequency and
Corrective Action Plans

DATE: March 15, 2001

Delete Working Memo #169 and #144

Purpose: It is necessary to establish a standard policy on how often shellfish and crustacea plant inspections will be made so that the Division of Shellfish Sanitation can accurately ascertain the sanitary conditions of the facility and compliance with HACCP requirements. In order for the Division to assure that sanitary conditions are adequate for the production of a safe product, and that HACCP requirements are being met it is necessary that the shellfish or crustacea plant be inspected on a frequent, unannounced basis.

Procedure: Shellfish and crustacea processing plants that are actively operating must be inspected for sanitary operating procedures and good manufacturing practices a minimum of once every month. These plants must receive a HACCP inspection at least once per quarter while they are in active operation. These are minimum frequencies! You may find that more frequent HACCP evaluations are necessary to achieve compliance. In situations where the plant is in active operation but not processing on the day of inspection, a HACCP inspection and sanitary operating procedure records review shall be performed. If an operational inspection has not been made for a currently certified plant by the end of the second month of each quarter, in the third month an extra effort should be made to establish contact with the owner so that an inspection can be made during operation or to establish that the plant should be deactivated. The important point is to establish contact in order to evaluate HACCP compliance, sanitary operating procedures and good manufacturing practices at the minimum frequencies previously stated or to deactivate the plant.

If a public health hazard exists, in the form of a critical deficiency, the hazard should be abated and if necessary, a follow-up inspection made as soon as possible to insure the hazard has been eliminated. When plants receive repeat deficiencies a corrective action plan must be developed by the shellfish specialist in cooperation with the plant owner. The inspection narrative must demonstrate that proper follow up for corrective action plans has been performed and if the action plan has not been met that administrative action is being pursued. For the purposes of this working memo repeat deficiencies are the exact same violative condition that occurs in inspections conducted over the past 12 months. An example would a missing record rate of greater than 10% for the same walk in cooler occurring more than once over the past 12

months.

The following conditions should warrant consideration for administrative action:

- Those processing facilities that have more than one repeat critical deficiency over the past 12 months.
- Those facilities that have more than 2 repeat key deficiencies or more than 4 repeat other deficiencies over the past 12 months.

Inspection frequencies and administrative action consideration guidelines in this working memo are minimums. If the shellfish specialist sees the need for greater inspection frequencies or administrative action consideration for other conditions they are free to pursue these courses of action.